

In the Matter of)
Expanding Online Public File Obligations to) MB Docket No. 14-127
Radio Licensees)

**COMMENTS OF
AMERICAN PUBLIC MEDIA GROUP, MINNESOTA PUBLIC RADIO, SOUTHERN
CALIFORNIA PUBLIC RADIO AND CLASSICAL SOUTH FLORIDA**

All of the APM Group station licensees are non-profit 501 (c) (3) charitable organizations and all of the APM Group stations are operated as public radio stations. Thus, all APM Group stations provide noncommercial educational programs. The funding for all stations of the APM Group comes from charitable donations from individuals and corporations, philanthropic grants, and earned revenue. A small portion of our funding is derived from state and federal sources. We have no shareholders and to the extent our revenue exceeds expenses, all revenue is put back into the business. Most often the companies of the APM Group are at financial break-even points.

The weekly cume of all of the APM Group radio stations combined is almost two million listeners per week.

Central to all of the work done at the APM Group are our mission statements. The mission statements of all the companies in the APM Group are similar:

The mission of Classical South Florida is to enrich the minds and nourish the spirit of our community through the art, availability and advocacy of classical music.

The mission of Southern California Public Radio is to strengthen the civic and cultural bonds that unite Southern California's diverse communities by providing the highest quality news and information service through radio and other interactive media. We will be a public forum that engages its audiences in an ongoing dialogue and exploration of issues, events and cultures in the region and in the world, seeking to provide greater understanding and new perspectives to the people of these communities and their leaders.

The mission of American Public Media and Minnesota Public Radio is to enrich the mind and nourish the spirit, thereby enhancing the lives and expanding the perspectives of our audiences, and assisting them in strengthening their communities.

We believe that the common thread among public radio producers is a public service mission to offer news, information and cultural programming that is responsive to the needs of the public - locally, regionally and nationally; that constitutes an expression of diversity and excellence; that involves creative risks; and that serves as an alternative to the mass media. The APM Group supports and attempts to carry out a similar mission in all that we do.

Discussion

The APM Group supports the FCC initiating a rulemaking to require all broadcast radio stations to post their public and political files to the FCC's online database. The APM Group is very proud of our track record of unbiased news reporting. We are also proud of our

track record of transparency and openness to the public—including transparency around those that provide financial support to APMG. We believe this commitment to transparency contributes to the public's trust of APMG as a source of unbiased news journalism and culture programming. As such, we support the FCC's proposed rule to require that all TV and radio stations post their public and political files to the FCC's online database. Enabling the public to access this information of media organizations would promote more public trust in media—something that is sorely lacking today.

Respectfully submitted,

American Public Media Group
Minnesota Public Radio | American Public Media
Southern California Public Radio
Classical South Florida



Lisa Radzak
Managing Director, Community & Government Relations
Minnesota Public Radio
480 Cedar Street
Saint Paul, MN 55101

August 19, 2014